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7
8 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

9 -oOo-

10 UNITED STATES OF AMERICA,)	
)	Case No: 2:22-mj-642-DJA
11 Plaintiff,)	
)	STIPULATION TO MODIFY
12 vs.)	CONDITIONS OF RELEASE
)	
13 DEANDRA MICHELLE SMITH,)	
)	
14 Defendant.)	

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, through Kimberly M Frayn, Assistant United States Attorney, and Brian
18 Pugh, Assistant Federal Public Defender, counsel for Deandra Michelle Smith, that Ms. Smith's
19 pretrial release travel condition be modified to allow Ms. Smith to make one trip to Mexico as
20 outlined below and for Pretrial Services to temporarily release to Ms. Smith possession of her
21 passport:

22 This stipulation is entered into for the following reasons:

- 23 1. Ms. Smith requests to travel to Mexico from August 23, 2023, to August 29, 2023.
- 24

conditions of release since that time. *See* ECF No. 7, “Minutes of Proceedings - Initial Appearance as to Deandra Michelle Smith held on 10/3/2022 before Magistrate Judge Elayna J. Youchah.”

8. Ms. Smith has demonstrated to her Pretrial Services Officer and the Court that she is not a risk of flight and that she can be trusted to possess her passport, travel outside the country, return to the United States, and appear for all future court appearances.

9. Wherefore, the parties hereby stipulate and request that this Court order Pretrial Services to temporarily return to Ms. Smith her passport as outlined above, and that Ms. Smith be permitted to travel to Mexico during the dates stated above, but only after providing to her Pretrial Services Officer her itinerary and address where she will be staying in Mexico.

Respectfully submitted this 26th day of July 2023.

RENE L. VALLADARES
Federal Public Defender


JASON M. FRIERSON
United States Attorney

By /s/ Brian Pugh
BRIAN PUGH
Assistant Federal Public Defender

By /s/ Kimberly M. Frayn
KIMBERLY M. FRAYN
Assistant U.S. Attorney

ORDER

IT IS SO ORDERED.


ELAYNA J. YOUCHAH
United States Magistrate Judge

DATED: July 27, 2023